

Joseph R. Saveri (State Bar No. 130064)
Steven N. Williams (State Bar No. 175489)
Joshua P. Davis (State Bar No. 193254)
James G. Dallal (State Bar No. 277826)
Anupama K. Reddy (State Bar No. 324873)
Christopher K.L. Young (State Bar No. 318371)
JOSEPH SAVERI LAW FIRM, INC.
601 California Street, Suite 1000
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
Email: jsaveri@saverilawfirm.com
swilliams@saverilawfirm.com
jdavis@saverilawfirm.com
jdallal@saverilawfirm.com
areddy@saverilawfirm.com
cyoung@saverilawfirm.com

Class Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CAPACITORS ANTITRUST LITIGATION

Master File No. 3:17-md-02801-JD
Case No. 3:14-cv-03264-JD

THIS DOCUMENT RELATES TO:
THE DIRECT PURCHASER CLASS ACTIONS

**DECLARATION OF STEVEN N.
WILLIAMS IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' REQUEST
FOR JUDICIAL NOTICE**

Date: February 13, 2020
Time: 1:30 PM
Judge: Honorable James Donato
Courtroom: 11, 19th Floor

1 I, Steven N. Williams, declare as follows:

2 1. I am counsel for Direct Purchaser Plaintiffs in this matter. I make this declaration in
 3 support of the Direct Purchaser Class's Request for Judicial Notice. If called as a witness, I could and
 4 would testify to the following based on my personal knowledge. I make this declaration pursuant to 28
 5 U.S.C. § 1746.

6 2. Attached hereto as Exhibit A is a true and correct copy of the Plea Agreement of settled
 7 Defendant Elna Co., Ltd. in *U.S. v. Elna Co., Ltd.*, No. 4:16-cr-00365-JD (CAND), Dkt. No. 40, filed on
 8 October 12, 2017. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD
 9 (Dkt. No. 651-11).

10 3. Attached hereto as Exhibit B is a true and correct copy of the Judgment in a Criminal
 11 Case in *U.S. v. Elna Co., Ltd.*, No. 4:16-cr-00365-JD (CAND), Dkt. No. 59, filed on February 12, 2018.

12 4. Attached hereto as Exhibit C is a true and correct copy of the Plea Agreement of settled
 13 Defendant Nichicon Corporation in *U.S. v. Nichicon Corporation*, No. 17-cr-00368-JD (CAND), Dkt.
 14 No. 19, filed on November 9, 2017. This Plea Agreement was previously filed in Master Docket No.
 15 3:17-md-02801-JD (Dkt. No. 651-12).

16 5. Attached hereto as Exhibit D is a true and correct copy of the Judgment in a Criminal
 17 Case in *U.S. v. Nichicon Corporation*, No. 17-cr-00368-JD (CAND), Dkt. No. 41, filed on April 24, 2018.

18 6. Attached hereto as Exhibit E is a true and correct copy of the Plea Agreement of settled
 19 Defendant Rubycon Corporation in *U.S. v. Rubycon Corp.*, No. 4:16-cr-00367-JD (CAND), entered on
 20 October 12, 2016. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD
 21 (Dkt. No. 651-13).

22 7. Attached hereto as Exhibit F is a true and correct copy of the Judgment in a Criminal
 23 Case in *U.S. v. Rubycon Corp.*, No. 4:16-cr-00367-JD (CAND), Dkt. No. 38, filed on February 3, 2017.

24 8. Attached hereto as Exhibit G is a true and correct copy of the Plea Agreement of current
 25 Defendant Nippon Chemi-Con Corporation in *U.S. v. Nippon Chemi-Con Corporation*, No. 4:17-cr-
 26 00540-JD (CAND), Dkt. No. 54, filed on May 31, 2018. This Plea Agreement was previously filed in
 27 Master Docket No. 3:17-md-02801-JD (Dkt. No. 651-14).

1 9. Attached hereto as Exhibit H is a true and correct copy of the Judgment in a Criminal
 2 Case in *U.S. v. Nippon Chemi-Con Corporation*, No. 4:17-cr-00540-JD (CAND), Dkt. No. 85, filed
 3 October 24, 2018.

4 10. Attached hereto as Exhibit I is a true and correct copy of the Plea Agreement of settled
 5 Defendant Hitachi Chemical Co., Ltd. in *U.S. v. Hitachi Chemical Co., Ltd.*, No. 4:16-cr-00180-JD
 6 (CAND), Dkt. No. 22, filed 06/10/16. This Plea Agreement was previously filed in Master Docket No.
 7 3:17-md-02801-JD (Dkt. No. 676-4).

8 11. Attached hereto as Exhibit J is a true and correct copy of the Judgment in a Criminal
 9 Case in *U.S. v. Hitachi Chemical Co., Ltd.*, No. 4:16-cr-00180-JD (CAND), Dkt. No. 31, filed July 12,
 10 2016.

11 12. Attached hereto as Exhibit K is a true and correct copy of the Plea Agreement of settled
 12 Defendant NEC TOKIN Corporation in *U.S. v. NEC TOKIN Corporation*, No. 3:15-cr-00426-JD, Dkt.
 13 No. 9-1, filed on January 5, 2016. This Plea Agreement was previously filed in Master Docket No. 3:17-
 14 md-02801-JD (Dkt. No. 679-3).

15 13. Attached hereto as Exhibit L is a true and correct copy of the Judgment in a Criminal
 16 Case in *U.S. v. NEC TOKIN Corporation*, No. 3:15-cr-00426-JD, Dkt. No. 20, filed January 25, 2016.

17 14. Attached hereto as Exhibit M is a true and correct copy of the Plea Agreement of
 18 current Defendant Holy Stone Holdings Co., Ltd. in *U.S. v. Holy Stone Holdings Co., Ltd.*, No. 4:16-cr-
 19 00366-JD, Dkt. No. 34, filed on October 12, 2017. This Plea Agreement was previously filed in Master
 20 Docket No. 3:17-md-02801-JD (Dkt. No. 679-3).

21 15. Attached hereto as Exhibit N is a true and correct copy of the Judgment in a Criminal
 22 Case in *U.S. v. Holy Stone Holdings Co., Ltd.*, No. 4:16-cr-00366-JD, Dkt. No. 52, filed February 12,
 23 2018.

24 16. Attached hereto as Exhibit O is a true and correct copy of the Plea Agreement of current
 25 Defendant Matsuo Electric Company Limited in *U.S. v. Matsuo Electric Co. Ltd.*, No. 4:17-cr-00073-JD,
 26 Dkt. No. 35, filed on October 26, 2017. This Plea Agreement was previously filed in Master Docket No.
 27 3:17-md-02801-JD (Dkt. No. 679-3).

17. Attached hereto as Exhibit P is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Matsuo Electric Co. Ltd.*, No. 4:17-cr-00073-JD, Dkt. No. 108, filed August 10, 2018.

18. Attached hereto as Exhibit Q is a true and correct copy of the Plea Agreement of Satoshi Okubo in *U.S. v. Satoshi Okubo*, No. 4:17-cr-00074-JD, Dkt. No. 10-2, filed April 11, 2017.

19. Attached hereto as Exhibit R is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Satoshi Okubo*, No. 4:17-cr-00074-JD, Dkt. No. 29, filed May 23, 2017.

20. Attached hereto as Exhibit S is a true and correct copy of the Plea Agreement of Tokuo Tatai in *U.S. v. Isawa et al.*, No. 15-CR-0163-JD, Dkt. No. 17, filed June 27, 2018.

21. Attached hereto as Exhibit T is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Isawa et al.*, No. 15-CR-0163-JD, Dkt. No. 31, filed October 24, 2018.

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on February 6, 2020 at San Francisco, California.

/s/ Steven N. Williams

Steven N. Williams